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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA,) Nos. CR 06-0725 SI
20 Plaintiff,) CR MISC. NO.: 03-271-MMC
21 v.)
22 TREVOR GRAHAM,) UNSEALING APPLICATION AND
23 Defendant.) PROPOSED ORDER

24 The United States hereby moves the Court for an order unsealing the immunity orders
25 served upon the following witnesses in connection with their respective grand jury testimonies in
26 the above captioned investigation (CR MISC. NO.: 03-271-MMC): Marion Jones; Timothy
27 Montgomery; Michelle Collins; Tom Craig; Ramon Clay; Alvin Harrison; and Calvin Harrison.
28 The United States previously requested sealing of the orders because at the time the immunity
orders were signed, disclosure of the witnesses' appearances before the grand jury would have

1 been inappropriate as grand jury matter and would have substantially impaired the criminal
2 investigation. That need for confidentiality no longer exists, as these witnesses may testify at the
3 trial in the above-captioned matter and the government is requesting copy of the immunity orders
4 in order to comply with its *Brady* obligations. The immunity orders were captioned under CR
5 MISC. NO.: 03-271-MMC, with the Hon. Maxine M. Chesney signing the orders as the assigned
6 Duty Judge. The government respectfully requests that this order pertain only to the orders for
7 the witnesses named herein, as other matters may have been lodged under this file number which
8 are not, at this time, appropriate for disclosure.

9
10 DATED: August 20, 2007

Respectfully submitted,

11 SCOTT N. SCHOOLS
12 United States Attorney

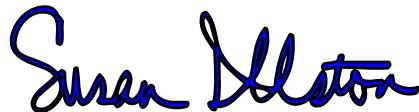
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14 _____/s/
15 JEFFREY R. FINIGAN
Assistant United States Attorney

16 ORDER

17 In light of the government's motion, and for the reasons stated therein, the immunity
18 orders for Marion Jones, Timothy Montgomery, Michelle Collins, Thomas Craig, Ramon Clay,
19 Alvin Harrison, and Calvin Harrison, filed under criminal number CR MISC. NO.: 03-271-
20 MMC, are hereby ordered unsealed. All other matters filed under this criminal number shall
21 remain under seal pending further order of the Court.

22
23 IT IS SO ORDERED.

24
25 DATED: 8/21/07, 2007



26
27 SUSAN ILLSTON
United States District Judge